

EXHIBIT A

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**

Case

Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Paige Holland-Thielen brings this charge against her former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired her and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

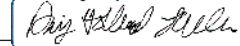
3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Paige Holland-Thielen

4a. Address (Street and number, city, state, and ZIP code) c/o Anne Shaver, Lieff Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000	4b. Tel. No. 415-956-1000
	4c. Cell No.
Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4d. Fax No.
	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

DocuSigned by:



E159702CF3F945

(Signature of representative or person making charge)

Paige Holland-Thielen

(Print/type name and title or office, if any)

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com

Address 275 Battery Street, 29th Floor, San Francisco CA 94111

Date 11/16/22 | 8:58 AM PST

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Paige Holland-Thielen

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 Paige Holland-Thielen and co-workers sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Paige Holland-Thielen co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired Ms. Holland-Thielen and four (4) other employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated four (4) other employees in July and August in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**

Case

Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (<i>Street, city, state, and ZIP code</i>) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (<i>factory, mine, wholesaler, etc.</i>) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (*set forth a clear and concise statement of the facts constituting the alleged unfair labor practices*)

Tom Moline brings this charge against his former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Mr. Moline and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (*if labor organization, give full name, including local name and number*)
Tom Moline

4a. Address (<i>Street and number, city, state, and ZIP code</i>) c/o Anne Shaver Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor, San Francisco, CA 94111 Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (*to be filled in when charge is filed by a labor organization*)**6. DECLARATION**

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

DocuSigned by:

Thomas Moline

731E7A5E31324D1

(signature of representative or person making charge)

Tom Moline

(Print/type name and title or office, if any)

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com

Address 275 Battery Street, 29th Floor, San Francisco, CA 94111 Date 11/15/22 | 2:55 PM PST

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Tom Moline

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 employee Tom Moline and several co-workers sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Moline co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired Moline and four (4) other employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated another four (4) employees in July and August in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Attorney Anne Shaver brings this charge on behalf of Employee A against their former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee A and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Anne Shaver

4a. Address (Street and number, city, state, and ZIP code) Lief Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000 Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/Anne B. Shaver

Anne B. Shaver

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Address 275 Battery Street, 29th Floor, San Francisco CA 94111

Date 11/16/2022

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee A¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 a group of employees sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. Employee A participated in the drafting of the Open Letter and its appendices. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee A co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired five (5) employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated Employee A on July 22, 2022, as well as three (3) other employees in July and August, in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee A is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Attorney Anne Shaver brings this charge on behalf of Employee B against their former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee B and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Anne Shaver

4a. Address (Street and number, city, state, and ZIP code) Lief Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/Anne B. Shaver

Anne B. Shaver

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Address 275 Battery Street, 29th Floor, San Francisco CA 94111

Date 11/16/2022

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee B¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 Employee B and several co-workers sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee B co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired Employee B and four (4) other employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations, SpaceX terminated another four (4) employees in July and August in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee B is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Attorney Anne Shaver brings this charge on behalf of Employee C against their former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee C and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Anne Shaver

4a. Address (Street and number, city, state, and ZIP code) Lief Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000 Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/Anne B. Shaver

Anne B. Shaver

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com

Address 275 Battery Street, 29th Floor, San Francisco CA 94111 Date 11/16/2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee C¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 a group of employees sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. Employee C participated in the drafting of the Open Letter. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee C co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired five (5) employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated Employee C on August 17, 2022, as well as three (3) other employees in July and August, in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee C is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716	
		c. Cell No. 202-285-8834	
		f. Fax. No.	
d. Address (<i>Street, city, state, and ZIP code</i>) One Rocket Road Hawthorne, California 90250		e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	
		g. e-mail Christopher.Cardaci@spacex.com	
		h. Number of workers employed 9,500	

i. Type of Establishment (<i>factory, mine, wholesaler, etc.</i>) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft
---	--

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Attorney Anne Shaver brings this charge on behalf of Employee D against their former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee D and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Anne Shaver

<p>4a. Address (<i>Street and number, city, state, and ZIP code</i>)</p> <p>Lieff Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000</p> <p>Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110</p>	<p>4b. Tel. No. 415-956-1000</p>
	<p>4c. Cell No.</p>
	<p>4d. Fax No.</p>
	<p>4e. e-mail ashaver@lchb.com</p>

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/Anne B. Shaver

Anne B. Shaver

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Address 275 Battery Street, 29th Floor, San Francisco CA 94111 Date 11/16/2022

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee D¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 a group of employees sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. Employee D participated in the drafting of the Open Letter. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee D co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired five (5) employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated Employee D on August 1, 2022, as well as three (3) other employees in July and August, in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee D is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Space Exploration Technologies Corp.		b. Tel. No. 202-649-2716
		c. Cell No. 202-285-8834
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005	g. e-mail Christopher.Cardaci@spacex.com
		h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Attorney Anne Shaver brings this charge on behalf of Employee E against their former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee E and eight other individuals for engaging in protected concerted activity at work.

Please see attached Addendum for a concise statement of the facts.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Anne Shaver

4a. Address (Street and number, city, state, and ZIP code) Lief Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000 Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
	4e. e-mail ashaver@lchb.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

/s/Anne B. Shaver

Anne B. Shaver

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.
415-956-1000

Office, if any, Cell No.

Fax No.

e-mail
ashaver@lchb.com

Address 275 Battery Street, 29th Floor, San Francisco CA 94111

Date 11/16/2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee E¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 Employee E and co-workers sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee E co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired Employee E and four (4) other employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated four (4) other employees in July and August in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee E is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

FORM NLRB-501
(3-21)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Space Exploration Technologies Corp.	b. Tel. No. 202-649-2716
	c. Cell No. 202-285-8834
	f. Fax. No.
d. Address (Street, city, state, and ZIP code) One Rocket Road Hawthorne, California 90250	e. Employer Representative Christopher Cardaci 1030 15th Street N.W. Washington, D.C. 20005
	g. e-mail Christopher.Cardaci@spacex.com
	h. Number of workers employed 9,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Office, manufacturing, and mission control	j. Identify principal product or service Designs, manufactures, and launches rockets and spacecraft
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(1) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)	
Attorney Anne Shaver brings this charge on behalf of Employee F against his former employer, Space Exploration Technologies Corp. ("SpaceX"), which committed an unfair labor practice when it fired Employee F and eight other individuals for engaging in protected concerted activity at work.	
Please see attached Addendum for a concise statement of the facts.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Anne Shaver	
4a. Address (Street and number, city, state, and ZIP code) Lieff Cabraser Heimann & Bernstein LLP 275 Battery Street, 29th Floor San Francisco, CA 94000	4b. Tel. No. 415-956-1000
	4c. Cell No.
	4d. Fax No.
Laurie Burgess Burgess Law Offices P.C. 498 Utah St., San Francisco, CA 94110	4e. e-mail ashaver@lchb.com
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)	
6. DECLARATION	
I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
/s/Anne B. Shaver (signature of representative or person making charge)	Anne B. Shaver (Print/type name and title or office, if any)
Tel. No. 415-956-1000	
Office, if any, Cell No.	
Fax No.	
e-mail ashaver@lchb.com	
Address 275 Battery Street, 29th Floor, San Francisco CA 94111 Date 11/16/2022	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Addendum – NLRB Charge of Employee F¹

In the past six months SpaceX has violated the NLRA by terminating employees for engaging in the core concerted protected activity of speaking up against SpaceX's failure and refusal to address the culture of sexism, harassment and discrimination that pervades the workplace via the permission granted such behavior by SpaceX management including its CEO Elon Musk and President Gwynne Shotwell. SpaceX's unlawful conduct includes the following:

On June 15, 2022 a group of employees sent an Open Letter to SpaceX's leadership protesting Musk's repeated conduct of issuing inappropriate, disparaging, sexually charged comments on Twitter – a platform that SpaceX specifically acknowledges as a formal source of news regarding SpaceX activities. Employee F participated in the drafting of the Open Letter. The Open Letter authors complained that Musk's statements (examples of which were attached to the Letter) permeated the workplace and created a hostile work environment. The Open Letter authors called upon SpaceX to take appropriate remedial action including condemning Musk's harmful behavior, holding all leadership accountable for their actions and seeking uniform enforcement of SpaceX's "No Asshole" policy. The Open Letter that Employee F co-authored and its appendices are attached hereto as **Exhibit A**.

On June 16, 2022, *immediately on the heels of engaging in this concerted protected activity*, SpaceX fired five (5) employees who participated in organizing to redress sexual harassment and discrimination in the workplace. SpaceX President Shotwell called the Open Letter "overreaching activism" and stated that SpaceX had "terminated a number of employees involved." See **Exhibit B**.

After this initial wave of wrongful retaliatory terminations, over the next two months SpaceX continued its campaign of retaliation and intimidation by interrogating dozens of employees in private meetings and falsely telling them that the conversations were attorney-client privileged and could not be disclosed to anyone. As a result of its unlawful coercive interrogations SpaceX terminated Employee F on July 29, 2022, as well as three (3) other employees in July and August in retaliation for their conduct of drafting and/or sharing the Open Letter with other SpaceX employees on internal company channels.

SpaceX engaged in the above unlawful conduct for the purpose of retaliating against employees for engaging in concerted protected activities and to discourage other employees from engaging in similar organizing activities protected under the NLRA.

¹ Employee F is proceeding anonymously to protect themselves from public harassment (aka "doxing") from fans of SpaceX and/or Mr. Musk.

Exhibit A

An open letter to the Executives of SpaceX,

In light of recent allegations against our CEO and his public disparagement of the situation, we would like to deliver feedback on how these events affect our company's reputation, and through it, our mission. Employees across the spectra of gender, ethnicity, seniority, and technical roles have collaborated on this letter. We feel it is imperative to maintain honest and open dialogue with each other to effectively reach our company's primary goals together: making SpaceX a great place to work for all, and making humans a multiplanetary species.

As SpaceX employees we are expected to challenge established processes, rapidly innovate to solve complex problems as a team, and use failures as learning opportunities. Commitment to these ideals is fundamental to our identity and is core to how we have redefined our industry. But for all our technical achievements, SpaceX fails to apply these principles to the promotion of diversity, equity, and inclusion with equal priority across the company, resulting in a workplace culture that remains firmly rooted in the status quo.

Individuals and groups of employees at SpaceX have spent significant effort beyond their technical scope to make the company a more inclusive space via conference recruiting, open forums, feedback to leadership, outreach, and more. However, we feel an unequal burden to carry this effort as the company has not applied appropriate urgency and resources to the problem in a manner consistent with our approach to critical path technical projects. To be clear: recent events are not isolated incidents; they are emblematic of a wider culture that underserves many of the people who enable SpaceX's extraordinary accomplishments. As industry leaders, we bear unique responsibility to address this.

Elon's behavior in the public sphere is a frequent source of distraction and embarrassment for us, particularly in recent weeks. As our CEO and most prominent spokesperson, Elon is seen as the face of SpaceX—every Tweet that Elon sends is a de facto public statement by the company. It is critical to make clear to our teams and to our potential talent pool that his messaging does not reflect our work, our mission, or our values.

SpaceX's current systems and culture do not live up to its stated values, as many employees continue to experience unequal enforcement of our oft-repeated "No Asshole" and "Zero Tolerance" policies. This must change. As a starting point, we are putting forth the following categories of action items, the specifics of which we would like to discuss in person with the executive team within a month:

Publicly address and condemn Elon's harmful Twitter behavior. SpaceX must swiftly and explicitly separate itself from Elon's personal brand.

Hold all leadership equally accountable to making SpaceX a great place to work for everyone. Apply a critical eye to issues that prevent employees from fully performing their jobs and meeting their potential, pursuing specific and enduring actions that are well resourced, transparent, and treated with the same rigor and urgency as establishing flight rationale after a hardware anomaly.

Define and uniformly respond to all forms of unacceptable behavior. Clearly define what exactly is intended by SpaceX's "No Asshole" and "Zero Tolerance" policies and enforce them consistently. SpaceX must establish safe avenues for reporting and uphold clear repercussions for all unacceptable behavior, whether from the CEO or an employee starting their first day.

We care deeply about SpaceX's mission to make humanity multiplanetary. But more importantly, we care about each other. The collaboration we need to make life multiplanetary is incompatible with a culture that treats employees as consumable resources. Our unique position requires us to consider how our actions today will shape the experiences of individuals beyond our planet. Is the culture we are fostering now the one which we aim to bring to Mars and beyond?

We have made strides in that direction, but [there is so much more to accomplish.](#)

Proposed Action Items

Publicly address and condemn Elon's harmful Twitter behavior. SpaceX must swiftly and explicitly separate itself from Elon's personal brand.

- Publicly state that Elon's Twitter behavior is not in line with SpaceX values.
- Expand the company's official social media presence to provide a professional and coherent public image of the company completely separate from Elon's online presence.
- Cease retweeting or directly linking to Elon's personal social media posts on any official SpaceX channels.

Hold all leadership equally accountable to making SpaceX a great place to work for everyone. Apply a critical eye to issues that prevent employees from fully performing their jobs and meeting their potential, pursuing specific and enduring actions that are well resourced, transparent, and treated with the same rigor and urgency as establishing flight rationale after a hardware anomaly.

- Institute an executive-level position, distinctly independent from Human Resources, responsible for ensuring that SpaceX is a great place to work for all individuals.
- Create direct channels for employee feedback to this new executive on the state of SpaceX culture across all departments to hold ourselves accountable for making progress towards this goal.
- Document workplace culture progress by regularly reporting data on employee hiring, promotion, and attrition disaggregated by experience, performance, and background.

Define and uniformly respond to all forms of unacceptable behavior. Clearly define what exactly is intended by SpaceX's "No Asshole" and "Zero Tolerance" policies and enforce them consistently. SpaceX must establish safe avenues for reporting and uphold clear repercussions for all unacceptable behavior, whether from the CEO or an employee starting their first day.

- Update the Employee Handbook and enforce annual in-person participation in comprehensive Diversity, Inclusion, and Misconduct training to ensure all employees adhere to these guidelines. Leadership candidates should be evaluated on these criteria.
- Commit to a consistent and transparent process for responses to all substantiated claims of misconduct, regardless of the alleged perpetrator.
- Document the efficacy of these policies by regularly reporting aggregate data on unacceptable behavior claims, involved party outcomes, and disciplinary actions.

To provide feedback on the above action items, fill out [this survey](https://s.surveymonkey.com/r/h409awcp) or scan the QR code below.



<https://s.surveymonkey.com/r/h409awcp>

Unwelcome behavior on Elon's Twitter

This document is a compilation of various examples of problematic Twitter posts by Elon, including “unwelcome behavior”, “subtle sexual harassment”, “sexual harassment”¹, and bullying directed at individuals and various marginalized groups via his Twitter posts. It also includes examples of excessively vulgar and sexual content that is inappropriate at our workplace. Most of these tweets have been posted within the last two years (March 2020 - June 2022). The purpose of this document is to warn coworkers of the resulting harm to our work culture, harm to marginalized employees, and our impaired ability as a community of space enthusiasts to do the amazing work which we're all here for.

The tweets selected for this document were chosen because they most clearly depict the “Bro culture” Elon seems to not only tolerate, but embrace and encourage online and in his personal life. The effects of these tweets, however, are not just limited to public perception of Elon's character. [Elon's Twitter account](#) is routinely used to announce SpaceX company news, is referenced in page 23 of the SpaceX employee handbook as a source of company news, and is documented as an official source of company information ([source](#)) in various SEC filings made by Tesla ([example](#)). For these and other reasons, statements made by Elon on Twitter either directly speak for SpaceX or indirectly reflect on our company's culture and those who work here. Various examples support this claim, from personal accounts of families and friends reaching out to employees asking if they agree with what Elon says to news articles and essays written about the type of work culture being promoted at SpaceX in light of statements made by Elon online². And in the absence of SpaceX saying otherwise, there's no reason for anyone to believe that the behavior repeatedly and consistently demonstrated by Elon in public, in spaces used for official company announcements, is not acceptable at SpaceX.

The content that Elon creates and promotes demonstrates tolerance, and even encouragement, of a workplace culture that is hostile to various marginalized and underrepresented groups. By mocking federally protected characteristics (including sex, sexual orientation, age, and race/religion), trivializing serious and traumatic challenges faced by those marginalized, and silencing attempts at raising legitimate concerns about our workplace culture by dismissing them as politically motivated attacks, Elon has set a very concerning example for what is acceptable and tolerated at SpaceX.

By staying silent on his public actions, taken on a platform which is considered official company communication, SpaceX and its executives have affirmed that Elon's behavior is acceptable at our company.

Please note that for each example screenshotted, a link is provided to the official source so that the full context can be examined. The vast majority of Tweets are still live on Elon's account, but

¹ Such language, defined on [this PDF](#) published by the United Nations, often leads to a “hostile work environment”.

² Examples of articles are included with various tweets throughout this document.

some which have been deleted are also included because they are relevant in establishing the ongoing pattern of harassment and/or bullying that started years ago and continues to this day.

Table of contents

Tweets targeting or affecting an individual	3
If you touch my wiener	4
Describe me while exposed	5
Stop hitting on me	6
In case you need to lose a boner	7
I keep forgetting you're still alive	8
Looks like you just came	9
Can't get it up (to orbit)	10
You're an idiot	11
Tweets targeting or affecting a group	12
Here it comes	13
Politically motivated	14
Mansplaining	15
Comparison to Hitler	16
TITS	17
Pronouns are oppression	18
Catgirl robots	19
Pronouns suck	20
Sperm Donor Clinic	21
Elongate	22
Other Tweets promoting an unwelcome and potentially hostile environment	23
Macrohard	24
Erotic Democracy	25
Deep thots	26
Our crane	27
Weekend meme juice	28
Huge cock	29
Emails	30
Tesla do the right thing	31

Tweets targeting or affecting an individual

If you touch my wiener



Status: online

Link: <https://twitter.com/elonmusk/status/1527757119239380993>

Describe me while exposed



Status: online

Link: <https://twitter.com/elonmusk/status/1527505449905528846>

Context: Elon presumably challenging the accuser to describe his genitalia, after the [Sexual Harassment allegation at SpaceX](#) reported by Insider on May 19th, 2022.

Stop hitting on me



Alexandria Ocasio-Cortez  @AOC · Apr 29

...

Tired of having to collectively stress about what explosion of hate crimes is happening bc some billionaire with an ego problem unilaterally controls a massive communication platform and skews it because Tucker Carlson or Peter Thiel took him to dinner and made him feel special



51.4K



23.5K



190.4K



Elon Musk 

@elonmusk

...

Replying to @AOC

Stop hitting on me, I'm really shy 🙄

2:27 PM · Apr 29, 2022 · Twitter for iPhone

52.1K Retweets

10.6K Quote Tweets

515.4K Likes

Status: online

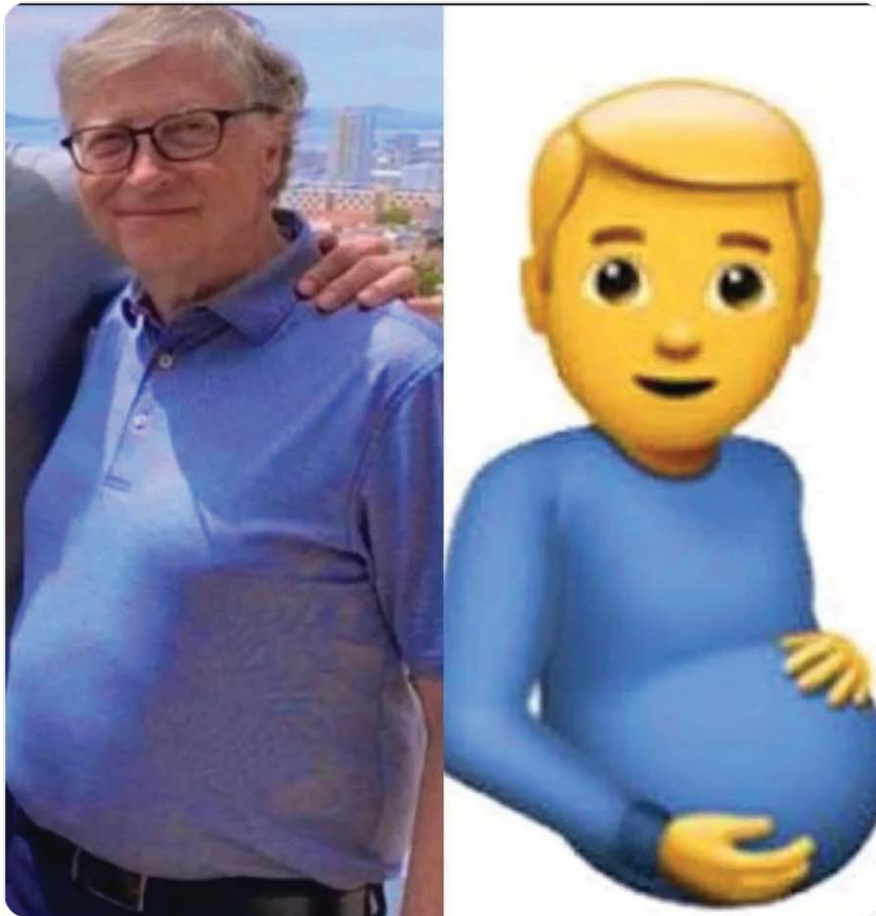
Link: <https://twitter.com/elonmusk/status/1520152887090892800>

In case you need to lose a boner



...

in case u need to lose a boner fast



8:30 PM · Apr 22, 2022 · Twitter for iPhone

142.6K Retweets 31.3K Quote Tweets 1.4M Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1517707521343082496>

Article:

<https://nypost.com/2022/06/06/elon-musk-posts-vulgar-tweet-about-bill-gates-during-fued/>

I keep forgetting you're still alive



Status: online

Link: <https://twitter.com/elonmusk/status/1459891238384115722>

Articles:

- <https://www.cnn.com/2021/11/14/business/elon-musk-bernie-sanders-tweet/index.html>
- <https://www.independent.co.uk/news/world/americas/us-politics/elon-musk-bernie-sanders-twitter-b1957625.html>

Looks like you just came

← **Tweet**

 **Ron Wyden** ✓ @RonWyden · Nov 6, 2021 ...
Whether or not the world's wealthiest man pays any taxes at all shouldn't depend on the results of a Twitter poll. It's time for the Billionaires Income Tax.

 **Elon Musk** ✓ @elonmusk · Nov 6, 2021
Much is made lately of unrealized gains being a means of tax avoidance, so I propose selling 10% of my Tesla stock.

Do you support this?
[Show this poll](#)

3,119 2,192 16.3K

 **Elon Musk** ✓ @elonmusk ...
Replying to @RonWyden

Why does ur pp look like u just came?

3:57 PM · Nov 7, 2021 · Twitter for iPhone

10.3K Retweets 5,808 Quote Tweets 94.1K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1457497438474981384>

Article: <https://sports.yahoo.com/elon-musk-made-gross-sex-130902137.html>

Can't get it up (to orbit)



Kenneth Chang @kchangnyt · Apr 26, 2021

SCOOP: Jeff Bezos' Blue Origin files a protest against NASA's awarding of the lunar lander contract to Elon Musk's SpaceX.



nytimes.com

Jeff Bezos' Rocket Company Challenges NASA Over SpaceX Moon La...
The space agency picked Elon Musk's company over two other bidders to take its astronauts back to the lunar surface.

447

832

5,199



Elon Musk ✓
@elonmusk

Replying to @kchangnyt

Can't get it up (to orbit) lol

4:31 PM · Apr 26, 2021 · Twitter for iPhone

4,775 Retweets 1,363 Quote Tweets 49.2K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1386825367948644352>

You're an idiot



Jarrett Walker ✓ @humantransit · Dec 14, 2017
In cities, @elonmusk's hatred of sharing space with strangers is a luxury (or pathology) that only the rich can afford. Letting him design cities is the essence of elite projection. humantransit.org/2017/07/the-da...



Yonah Freemark ✓ @yfreemark · Dec 14, 2017
To summarize Elon Musk's views on transit: It's terrible. You might be killed. Japanese trains are awful. Individualized transport for everyone! Congestion? Induced demand? Climate change impacts? Unwalkable streets? Who cares! [wired.com/story/elon-mus...](https://www.wired.com/story/elon-mus...)

in the ass," he continued. "That's why
t. And there's like a bunch of random
might be a serial killer, OK, great. And
like individualized transport, that go
nen you want."

189 1,473 3,885



Elon Musk ✓ @elonmusk · Dec 14, 2017
You're an idiot

811 4,973 35.8K



Elon Musk ✓ @elonmusk · Dec 14, 2017
Sorry

110 336 2,895



Adam Lilling @ALilling · Dec 14, 2017
Sorry that he's an idiot?

4 24 232



Elon Musk ✓ @elonmusk

Replying to @ALilling and @humantransit

Meant to say "sanctimonious idiot"

10:13 PM · Dec 14, 2017 · Twitter for iPhone

237 Retweets 70 Quote Tweets 2,937 Likes

Status: online

Link: <https://twitter.com/elonmusk/status/941500121564332032>

Link: <https://twitter.com/elonmusk/status/941551760799277056>

Context: A tweet from Jarrett Walker, a public transit planning and policy consultant, criticizing him for championing individual, over public, transport.

Article:

<https://www.theguardian.com/cities/2017/dec/21/elon-musk-public-transport-transit-painful-twitte>
r

Tweets targeting or affecting a group

Here it comes



7:44 AM · May 31, 2022 · Twitter for iPhone

147K Retweets 23.1K Quote Tweets 1.4M Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1531647849599057921>

Later followed by this tweet:



9:05 AM · Jun 1, 2022 · Twitter for iPhone

4,426 Retweets 534 Quote Tweets 69.3K Likes

Link: <https://twitter.com/elonmusk/status/1532030554778087424>

Note the original "here it comes" tweet is still up. An apology, if this is what it is, means nothing if behavior is not corrected.

Politically motivated



Elon Musk ✓
@elonmusk

...

The attacks against me should be viewed through a political lens – this is their standard (despicable) playbook – but nothing will deter me from fighting for a good future and your right to free speech

8:28 PM · May 19, 2022 · Twitter for iPhone

85.3K Retweets **10.7K** Quote Tweets **741.6K** Likes

Status: online
Link: <https://twitter.com/elonmusk/status/1527491436005957633>
Context: the [Sexual Harassment allegation at SpaceX](#) reported by Insider on May 19th, 2022

Mansplaining



Elon Musk ✓
@elonmusk

...



10:46 AM · May 19, 2022 · Twitter for iPhone

30.8K Retweets **4,202** Quote Tweets **368K** Likes

Status: online

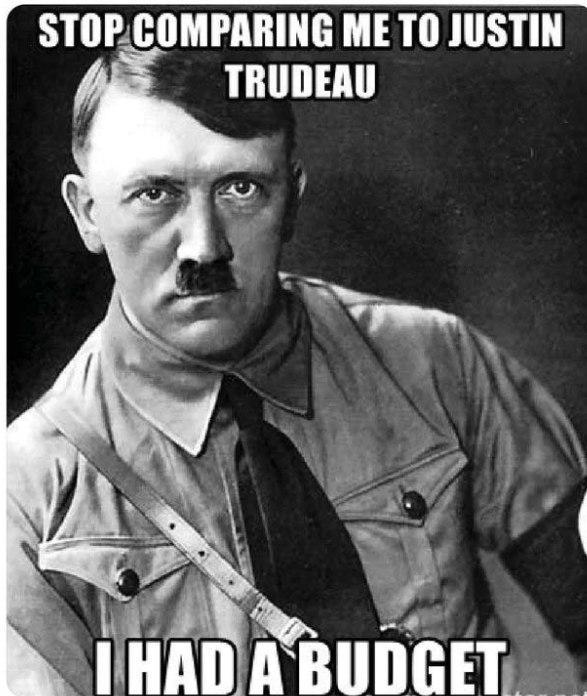
Link: <https://twitter.com/elonmusk/status/1527344969471520768>

Comparison to Hitler



Elon Musk ✓
@elonmusk

Replying to @CoinDesk @Aoyon_A and
@realDannyNelson



11:46 PM · 16 Feb 22 · Twitter for iPhone

Status: deleted

Context: In response to [a tweet](#) linking the coinbase article about Trudeau blocking crypto donations to Canadian Trucker protesters.

Article:

<https://www.theguardian.com/technology/2022/feb/17/elon-musk-criticised-for-comparing-justin-trudeau-to-adolf-hitler-tweet-auschwitz>

TITS



Status: partially deleted

Link: <https://twitter.com/elonmusk/status/1453954994546229253>

Article: <https://mashable.com/article/elon-musk-sexist-joke-tweets>

Pronouns are oppression



Status: online

<https://twitter.com/elonmusk/status/1338365886542049282>

Article:

<https://cleantechnica.com/2020/12/16/real-friends-interrupt-you-when-you-are-making-a-mistake/>

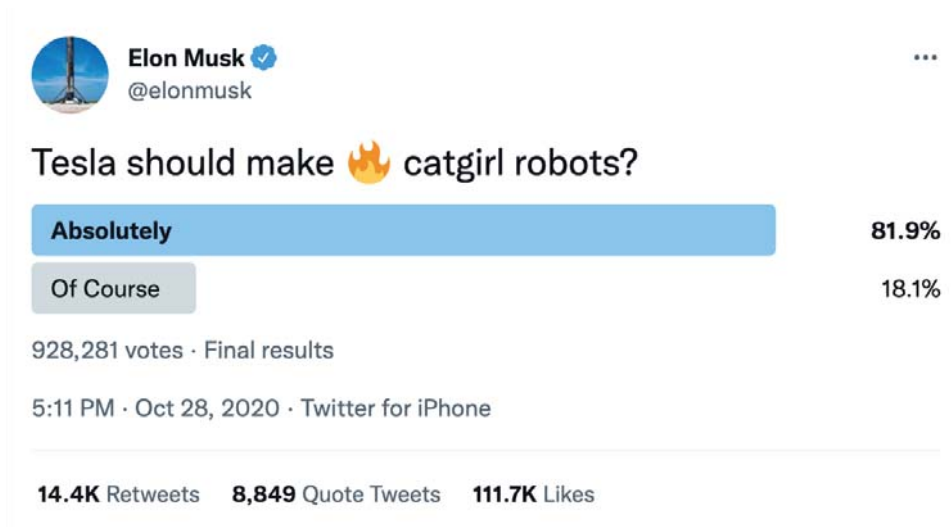
In response to the above article:



Status: online

Link: <https://twitter.com/elonmusk/status/1339253909546823682>

Catgirl robots



Status: online

Link: <https://twitter.com/elonmusk/status/1321605428963233794>

Pronouns suck



Elon Musk ✓
@elonmusk

...

Pronouns suck

8:42 PM · Jul 24, 2020 · Twitter for iPhone

19.7K Retweets 15.3K Quote Tweets 255.8K Likes

Status: online

<https://twitter.com/elonmusk/status/1286869404874088448>

Article:

<https://www.forbes.com/sites/sethcohen/2020/07/25/tesla-founder-elon-musk-uses-twitter-to-mock-transgender-inclusion/?sh=11f2b1e1647f>

Sperm Donor Clinic



Status: online

Link: <https://twitter.com/elonmusk/status/1321275062998257665>

Later in the thread, he replied:



Elongate



Elon Musk ✓
@elonmusk

...

Finally, we get to use Elongate as scandal name. It's kinda perfect. 🤖



Elon Musk ✓ @elonmusk · Mar 25, 2021

If there's ever a scandal about me, *please* call it Elongate

10:43 PM · May 19, 2022 · Twitter for iPhone

28.1K Retweets **3,922** Quote Tweets **293K** Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1527525498460508160>

Context: the [Sexual Harassment allegation at SpaceX](#) reported by Insider on May 19th, 2022

Other Tweets promoting an unwelcome and potentially hostile environment

Macrohard



Naughtius Maximus



youtube.com

Biggs Dickus - Monty Python, Life of Brian.

Just one of many brilliant scenes from the epic comedy "Life of Brian" by Monty Python.PS: Subtitles is the originals from the blu-ray.PS 2: Yes, we know abo...

1:02 AM · Oct 25, 2021 · Twitter for iPhone

952 Retweets 145 Quote Tweets 19.6K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1452546064591040513>

Erotic Democracy



Elon Musk ✓
@elonmusk

...

erotic democracy >> sclerotic democracy

6:08 PM · Oct 24, 2021 · Twitter for iPhone

4,158 Retweets **499** Quote Tweets **63.4K** Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1452442007784263682>

Deep thots



Elon Musk
@elonmusk

...

Deep thots



ginivera_ she/he/they has no hair

52m 25 likes Reply



— Hide replies



hani_srour @ginivera_ are you afraid to misgender a dinosaur



11:47 AM · May 26, 2021 · Twitter for iPhone

26K Retweets 3,697 Quote Tweets 289.8K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1397625459437826049>

Our crane



Check out our new crane



8:34 PM · Mar 26, 2021 · Twitter for iPhone

45.4K Retweets 6,454 Quote Tweets 559K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1375652425814704128>

Weekend meme juice



Elon Musk ✓
@elonmusk

...

Lil meme juice for the weekend

Personally I don't think they thought
this through at all



6:12 AM · Feb 13, 2021 · Twitter for iPhone

19.1K Retweets 2,368 Quote Tweets 273.8K Likes

Status: online

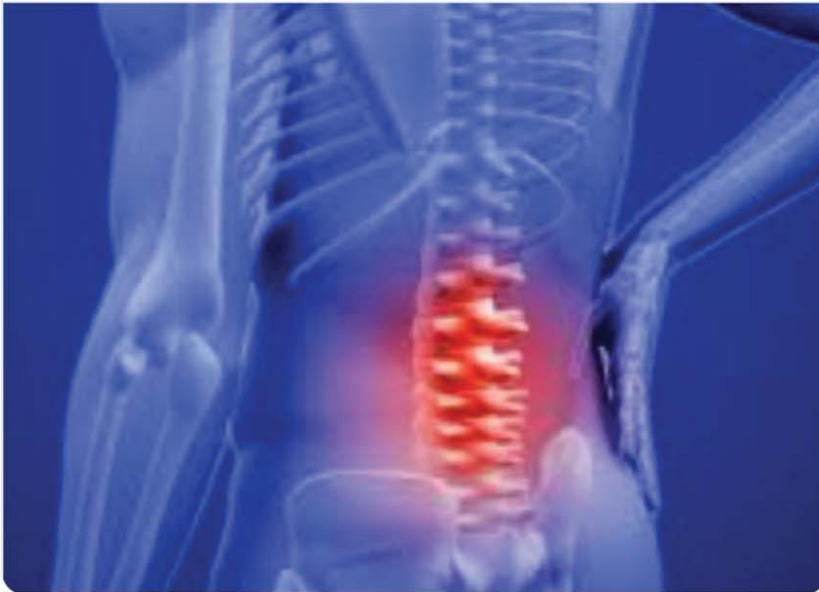
Link: <https://twitter.com/elonmusk/status/1360592735409946625>

Huge cock



Replying to @Zwiebelbach @its_menieb and @CyberpunkGame

My back after carrying
my huge cock all day



7:25 AM · Dec 14, 2020 · Twitter for iPhone

12.8K Retweets 4,685 Quote Tweets 72.4K Likes

Status: online

Link: <https://twitter.com/elonmusk/status/1338505515719143425>

Emails

Tesla do the right thing

Elon Musk

Inbox - Exchange May 31, 2017 at 2:37 AM

Doing the right thing

To: Everybody

About four years ago, I sent out an email describing some of the core principles of Tesla. Since then, we have grown from 4,500 people to 33,000, so the vast majority of the company has never received this note. We are redoing the first day orientation and Tesla handbook to more clearly capture and emphasize these points, but I thought I should send this out in advance.

In my email below, please pay particular attention to the first point on the list. Tesla has to be hardcore and demanding, not for the hell of it, but because we are fighting for a good cause against giant, entrenched competitors who just want the status quo to continue. The list of companies that want to kill Tesla is so long, I've lost track – a week doesn't go by without some "Tesla Killer" article. The only way for a little company to prevail against those much larger companies is to work faster, smarter and harder. The passing grade at Tesla is excellence, because it has to be.

However, this does not give license to anyone to be a jerk. It is incredibly important that people look forward to coming to work in the morning. One of the best feelings in the world is to be part of a team that is fired up to achieve what most industry experts say is impossible! For many companies out there, work is like jail – employees look forward to Friday and dread Monday. That's horrible. We never want to be like that.

Part of not being a huge jerk is considering how someone might feel who is part of an historically less represented group. They have endured difficulties that someone born or raised in a more privileged situation did not. This doesn't mean that there is a different standard of performance or that you can't give critical feedback. You should – doing anything else would be an insult to the hard work it took to get there – but don't ever intentionally allow someone to feel excluded, uncomfortable or unfairly treated. Sometimes these things happen unintentionally, in which case you should apologize.

In fairness, if someone is a jerk to you, but sincerely apologizes, it is important to be thick-skinned and accept that apology. If you are part of a less represented group, you don't get a free pass on being a jerk yourself. We have had a few cases at Tesla where someone in a less represented group was actually given a job or promoted over more qualified highly represented candidates and then decided to sue Tesla for millions of dollars because they felt they weren't promoted enough. That is obviously not cool.

What it comes down to is this: do what would make your parents proud. If you can't look someone you respect in the eye and explain what you did, don't do it.

Thanks,
Elon

Link: <https://www.tesla.com/blog/hotbed-misinformation>

Article:

<https://money.cnn.com/2017/11/15/technology/elon-musk-tesla-racial-discrimination/index.html>

Excerpt from email:

In fairness, if someone is a jerk to you, but sincerely apologizes, it is important to be thick-skinned and accept that apology. If you are part of a less represented group, you don't get a free pass on being a jerk yourself. We have had a few cases at Tesla where someone in a less represented group was actually given a job or promoted over more qualified highly represented candidates and then decided to sue Tesla for millions of dollars because they felt they weren't promoted enough. That is obviously not cool.

Commentary:

It seems like the *real* problem at Tesla (and SpaceX) is not the lack of diversity, but rather a plethora of maliciously acting diverse employees who are suing Tesla and not forgiving jerks when they apologize. These diverse employees are also getting a free pass to be jerks to the white male population.

Exhibit B



Gwynne Shotwell

Gwynne Shotwell; Brian Bjelde

6/16/2022

Please stay focused on the SpaceX mission

You may have received an unsolicited request from a small group of SpaceX employees for your signature on an “open letter” yesterday and your participation in a related survey. Based on diverse employee feedback, this has upset many. That is, the letter, solicitations and general process made employees feel uncomfortable, intimidated and bullied, and/or angry because the letter pressured them to sign onto something that did not reflect their views. Employees also complained that it interfered with their ability to focus on and do their work. We have 3 launches within 37 hours for critical satellites this weekend, we have to support the astronauts we delivered to the ISS and get cargo Dragon back to flight-ready, and after receiving environmental approval early this week, we are on the cusp of the first orbital launch attempt of Starship. We have too much critical work to accomplish and no need for this kind of overreaching activism – our current leadership team is more dedicated to ensuring we have a great and ever-improving work environment than any I have seen in my 35-year career.

We solicit and expect our employees to report all concerns to their leadership, senior management, HR, or Legal. But blanketing thousands of people across the company with repeated unsolicited emails and asking them to sign letters and fill out unsponsored surveys during the work day is not acceptable, goes against our documented handbook policy, and does not show the strong judgment needed to work in this very challenging space transportation sector. We performed an investigation and have terminated a number of employees involved.

I am sorry for this distraction. Please stay focused on the SpaceX mission, and use your time at work to do your best work. This is how we will get to Mars.